

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS**

**FRIEDRICHS HARRIS, ADMINISTRATOR OF  
THE ESTATE OF EVAN M. HARRIS,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 2:16-cv-00046  
JUDGE BAILEY**

**Q&A ASSOCIATES, INC.,  
ANGELA SHOCKLEY, KEITH BISHOP,  
MATTHEW SHOCKLEY, SANDY  
SCHMIEDEKNECHT, and TAMMY ROBBINS.**

**Defendants.**

**DEFENDANTS' RULE 26 EXPERT WITNESS DISCLOSURE**

Defendants, Q&A Associates, Inc., Angela Shockley, Keith Bishop, Matthew Shockley, Sandy Schmiedeknecht, and Tammy Robbins (hereinafter collectively "Defendants"), make the following expert disclosure pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Amended Scheduling Order in this case. Defendants note that Plaintiff has failed to make expert disclosures pursuant to Rule 26(a)(2) and this Court's schedule.

At this time, the Defendants disclose the following expert:

- 1. Daniel Bruce Thistlethwaite, M.D.**  
312 6<sup>th</sup> Avenue, Suite 2  
South Charleston, WV 25303

Dr. Thistlethwaite is a board certified psychiatrist licensed in the state of West Virginia. Dr. Thistlethwaite is expected to testify consistent with his report, attached as Exhibit 1. His opinions are stated to a reasonable degree of medical certainty.

Dr. Thistlethwaite's history of testimony is attached as Exhibit 2; his curriculum vitae is attached as Exhibit 3, his list of reliance materials is attached as Exhibit 4; and his fee schedule is attached as Exhibit 5.

2. Defendants reserve the right to disclose an expert to offer testimony regarding the assessment, monitoring, and programs of Q&A Associates, Inc. and its staff depending on whether plaintiff is permitted to offer expert testimony in these areas.

3. Defendants reserve the right to disclose additional experts depending on what theory or theories plaintiff pursues in this matter, as discovery is ongoing and plaintiff has thus far not identified a theory that he believes was the cause of the subject incident.

4. Defendants reserve the right to elicit expert opinions from fact witnesses to the extent they are qualified and competent to render such opinions in this civil action.

5. Defendants reserve the right to call any additional witnesses whose identity may be disclosed through discovery or additional investigation, between the date of this designation until the time of trial.

6. Defendants reserve the right to call any witness identified or deposed with respect to the relevant issues involved in this litigation.

7. Defendants reserve the right to supplement this expert witness designation.

8. Defendants reserve the right to disclose rebuttal experts as discovery is ongoing.

**DEFENDANTS,**

**By Counsel**

/s/ Lindsey M. Saad

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CORPORATION, ANGELA SHOCKLEY, KEITH  
BISHOP, MATTHEW SHOCKLEY, AND SANDY  
SCHMIEDEKNECHT, and TAMMY ROBBINS.

Defendants.

**CERTIFICATE OF SERVICE**

I certify that on this 15th day of December, 2017, I filed electronically via CM/ECF a true copy of “**DEFENDANTS’ RULE 26 EXPERT DISCLOSURE**” with notice of the same being electronically served by the Court and a copy served via U.S. Mail to the to the following:

David A. Sims, Esq.  
Law Offices of David A. Sims, PLLC  
P.O. Box 5349  
Vienna, WV 26105

/s/ Lindsey M. Saad  
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Lindsey M. Saad (WV Bar No. 11155)